

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Implementation and Administration of
California Renewables Portfolio Standard
Program

Rulemaking 08-08-009
(Filed August 21, 2008)

**RENEWABLE PORTFOLIO STANDARD COMPLIANCE REPORT
SUBMITTED BY
BEAR VALLEY ELECTRIC SERVICE,
A DIVISION OF GOLDEN STATE WATER COMPANY (U 913 E)**

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(U 913 E)

August 3, 2009

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I. INTRODUCTION

- A. This Supplemental Report Accompanies the August 2009 Compliance Report With Flexible Compliance Information and Supplemental Worksheets.

Golden State Water Company (U 913 E), through its Bear Valley Electric Service division (BVES), hereby files its August 2009 Semi-Annual Compliance Report (Compliance Report). The Compliance Report consists of: (1) the required unmodified report worksheets, based on the Energy Division's Final August 2009 Compliance Report Template for Small Investor Owned Utilities (Template); (2) this narrative; and (3) three supplemental worksheets added to the original Template by BVES.¹

¹ See Template in Excel format as supplemented by BVES with three tabbed worksheets located to the right of the "Officer Verification" tab.

B. Any Apparent Penalty is Contested.

BVES submits its Compliance Report with explanatory comments in this narrative that demonstrate good cause for deferral of the RPS requirements in the interest of its ratepayers, and the waiver of any apparent penalties² in accordance with the flexible compliance rules.

Notwithstanding its continued efforts over the last several years, BVES has not been able to obtain any RPS-eligible energy for its supply portfolio. In D.08-05-029, Section 3.6.3.3, the Commission states that “none of the SMJUs will be potentially subject to the penalty until 2010 at the earliest”; however, notwithstanding this unequivocal statement by the Commission, the Compliance Report automatically calculates penalties, even with flexible compliance,³ for 2007 and 2008.

BVES contests the apparent penalties shown on the Compliance Report, such that they are not due and payable;⁴ furthermore, BVES requests that any and all penalties be waived and eliminated to properly execute the Commission’s intentions in D.08-05-029.

² Reference herein to “apparent penalties” includes “potential” penalties and “current” penalties as set forth in the attached RPS Compliance Report, as well as any other penalties arising out of the RPS program.

³ See Template in Excel format; specifically, the “Accounting” and “Summary” tabs.

⁴ “Whether or not a reporting LSE states a penalty on a particular report, stating the penalty:

‘does not make the penalty due and payable. Rather, parties are correct that the LSE may identify one of the four conditions which permit deferral or temporary waiver. (D.03-07-071, pp. 50-51). Alternatively, the LSE may seek to demonstrate lack of effective competition, that deferral promotes ratepayer or program interests, or other good cause. (D.03-06-071, p. 53, D.03-12-065, p. 8)’ (D.06-10-050, pp. 36-37.)

C. Good Cause Exists for Deferral of the RPS Requirement.

Similar to BVES' past RFPs for renewable resources, the number of responses to its 2008 RFP was very disappointing. There were only two responses. RFP responses in 2006 and 2007 were also inadequate. Each year the meager proposals submitted to BVES were either too expensive, not a good fit for the BVES portfolio, or the respondents or developers withdrew or unacceptably altered their offers. Additionally, an imminent Commission decision on what appeared to be a viable alternative for BVES to meet its RPS requirement, tradable RECs (TRECs), continues to be delayed. With inadequate responses to its RFPs and no TREC decision, BVES is left in a position of having no RPS-eligible renewables at this time.

Furthermore, the relatively small amount of renewables required by BVES makes it less attractive to producers and developers of renewable energy projects. A project becomes more competitively priced when there are economies of scale; the renewable resources needed by BVES do not allow for scale economies. BVES believes the small amount of renewable energy required for its RPS compliance, compared to the three large electrical corporations, restricts the number and type of projects being presented by developers. For BVES, there is convincing evidence of a lack of effective competition for projects that would supply BVES' RPS requirement at reasonable prices. The fact

"A penalty is due and payable with any particular report only if the LSE does not contest the penalty. If contested, the penalty is due only after later agreement by the LSE, or a later final determination by the Commission." (pp. 3-4.)

Administrative Law Judge's Ruling Granting Motion of Mountain Utilities for Reconsideration and Modification of March 12, 2007 Ruling on Reporting Format, filed March 30, 2007, in R.06-05-027

remains that there are simply too few RPS developers interested in supplying the RPS requirements of a small utility like BVES.

It is equally clear that public goods funds are inadequate to cover the above-market costs BVES has seen in the proposals submitted to it over the last three rounds of RFPs. The provisions of Resolution E-4199 show inadequate funds for BVES.

The international financial crisis has also adversely affected renewable resource developers, drying up sources of credit and investment. In fact, one of the candidate developers of a project presented to BVES was completely stalled for the greater part of a year due to the financial crisis, which hit its parent company. The international financial crisis thus adversely affected utilities like BVES that are in great need of reasonably-priced RPS resources.

Deferral of BVES' RPS requirements will promote the interests of BVES ratepayers by avoiding rate shock caused by accepting the high cost of proposed RPS resources. In addition, deferral will help BVES meet its RPS goals when the field of renewable suppliers becomes broader, deeper and more competitive through the future use of improved, less-expensive technology and/or less-costly, more conventional RPS resources.

In light of three successive and discouraging RFP processes demonstrating an extremely constrained and uncompetitive market for small RPS projects, BVES has diligently pursued RPS opportunities through the bilateral-contracting process. If BVES is able to negotiate acceptable contracts and they are approved by the Commission, these

opportunities may allow BVES to achieve RPS compliance for the immediate future.⁵ It is BVES' hope that it can achieve near-term compliance with its RPS obligations through the execution of potentially two RPS-eligible contracts this year. At this stage of the negotiations, the two contracts appear viable and seem to fit well with the needs of the BVES portfolio.

II. BACKGROUND INFORMATION ON BEAR VALLEY ELECTRIC SERVICE

Golden State Water Company is an investor-owned utility that, through its Bear Valley Electric Service division, owns and operates an electric distribution utility system that provides retail electric service to about 23,000 customers in a service area in the Big Bear Lake area of San Bernardino County, California. BVES provides electric service in a resort community, primarily to residential customers, but also to about 1,400 commercial, industrial, and public-authority customers, including two ski resorts. The summer peak load in its service area is about 23 MW, and the winter peak load is about 41 MW when snowmaking machines at the ski resorts are operating and tourist activity is high.

⁵ The Settlement Agreement approved in D.02-07-041 with a cost cap of \$77 per MWh requires BVES to apply for contract approval only by application, as reflected in *Opinion on Participation of Small and Multi-jurisdictional Utilities in the Renewable Portfolio Standard Program* [. . . we will require that BVES submit any PPAs for RPS-eligible power for approval by means of an application, rather than an advice letter, as long as any cap on its charges for electricity is in place.”]. D.08-05-029, at p. 29.

III. RENEWABLE COMPLIANCE FILING

A. This Compliance Report.

This filing includes the following report: August 2009 Semi-Annual Compliance Report: Bear Valley Electric Service, which is attached. BVES is providing this Compliance Report as required in Commission orders using the spreadsheet provided by the Commission's Energy Division, as revised in template format for small investor owned utilities. The apparent penalties are contested.

The renewable resources BVES identifies in the Compliance Report's "Procurement Detail, Generic Future Contracts" tabs and sections, represent the best assessment of BVES at this time of the effect of adding to BVES' portfolio the two potential RPS-eligible contracts currently being negotiated. The factors weighed in the assessment are subject to significant change over time, including the timeframe to obtain CPUC approval through the application process.

Related developments may affect the assessment BVES has made in preparing this Compliance Report. One prominent example would be the creation of an efficient, competitive market in TRECs for use in RPS compliance, a development that BVES continues to support.

B. The Supplemental Worksheets.

BVES has added three supplemental tabbed worksheets to the right of the Officer Verification tab. The tabs are marked MODIFIED - Summary 07, MODIFIED Summary - 08 and MODIFIED Accounting Tab - Aug 09. The purpose of these supplemental

worksheets is to show that BVES is invoking flexible compliance for all of its RPS requirements for 2007-2009⁶ and not just what can be deferred *without* explanation. BVES submits there is good cause for the waiver of all penalties.

IV. CONCLUSION

BVES has been actively pursuing viable opportunities to meet its 20% RPS goal by 2010, however, the way forward remains very challenging. BVES will continue to work diligently toward meeting its RPS goals, including the negotiation of two potential renewable energy contracts and additional RFPs. If the RPS contracts currently being negotiated are ultimately executed and approved by this Commission, BVES may be in a position to meet its immediate RPS obligations. However, given the continuing lack of a competitive market for renewable resources for a small utility like BVES, it remains doubtful that BVES can obtain sufficient, reasonably-priced renewal energy to fully meet its near-term RPS requirements.

Finally, as stated initially, BVES contests any apparent penalty and requests a prompt and complete waiver.

⁶ The August 2009 Compliance Report revises two items. The first is how much BVES deferred in 2007 and the second is a correction to the number of decimal points used in the calculation of 2008 potential penalties.

Dated: August 3, 2009

Respectfully submitted,

By /s/ Dennis W. De Cuir
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Rulemaking 08-08-009
(Filed August 21, 2008)

Bear Valley Electric Service

**August 2009 SEMI-ANNUAL COMPLIANCE REPORT
PURSUANT TO THE CALIFORNIA RENEWABLES PORTFOLIO
STANDARD**

August 3, 2009

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CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

Reporting and Compliance Worksheet Instructions

1. California's RPS Program requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), Electric Service Providers (ESP), and Community Choice Aggregators (CCAs) to file a minimum of two reports each year illustrating performance within the program. Parties may refer to the November 20, 2008 Assigned Commissioner Ruling Addressing Process Issues Relative to RPS Compliance Reports for more information.
 - > The March 1 report (with updates after the California Energy Commission (CEC) verifies procurement, as needed) is used by the Commission to determine compliance for the prior year(s). This report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement data for at least three years (Decision (D.) 06-10-050, page 45, 49).
 - > The August 1 report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement levels for each year forward through 2020 (D.06-10-050, page 45, 51). The August report may be used by the Commission to make a final determination of compliance for the prior year(s).
2. Any load serving entity (LSE) seeking confidentiality protection should file a declaration. Confidentiality requests shall comply with the substantive and procedural rules set forth in D.06-06-066, as modified by D.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for confidentiality should include the identification of all redacted information by tab name and cell reference, not to be confused with the line numbers provided in the Accounting tab.
3. RPS compliance reports will be submitted to the Commission as specified below:
 - > Serve a public version on the service list in proceeding R.08-08-009. All pages must be legible. LSEs are responsible for maintaining confidentiality when serving a redacted report.
 - > File a confidential version with the Energy Division by e-mailing an electronic version to ab1@cpuc.ca.gov and svn@cpuc.ca.gov
 - > Send paper copies (confidential and public) to each of the assigned Administrative Law Judges (ALJs):

Burton W. Mattson and Anne E. Simon
 California Public Utilities Commission
 505 Van Ness Avenue
 San Francisco, CA 94102
4. Any questions regarding the completion and/or filing of this report can be directed to:
Amy Baker, Energy Division, California Public Utilities Commission: ab1@cpuc.ca.gov, (415) 703-1691
5. Include the Title Page and fill out the following information:
 - > Name of the LSE filing the Report
 - > Date the Report is being filed
 - > Contact information
6. Complete the Officer Verification Form in the format provided (Rule 1.11)
7. Yellow cells throughout the spreadsheet indicate user supplied data by the LSE where and when applicable.
8. All data must be entered in MWh out to three decimal points to accurately account for retail sales, procurement and targets. The spreadsheet will display MWh throughout. Do not round any reporting data, as this may trigger some cells to turn red.
9. The spreadsheet included in this report has locked cells to ensure that targets, procurement and penalties are accurately calculated and reported from the data provided by the user. An unprotected version of the spreadsheet is also available by request.
10. Line #'s in the "Accounting" tab hyperlink to the "Calculations" tab, which provides additional information on the particular line item or section of the "Accounting" tab.

SUMMARY TAB

11. The "Summary" tab is linked to the "Accounting" tab and "Procurement Detail" tab, no data entry is required.
12. If the LSE determines that additional information is required in order to present a full and complete report, mark the box provided on the "Summary" tab. Any additional information should support the LSE's claim within the guidelines of the eight allowable reasons for noncompliance. Furthermore, please state anything else the filing LSE believes is necessary for a full and complete reporting to the Commission in order to allow an informed decision on compliance. This may include, for example, footnotes and other explanatory information as necessary and reasonable.

ACCOUNTING TAB

13. Begin by entering the relevant data for Lines 1-3, this will calculate the LSE's Baseline Procurement Amount. Enter actual and forecasted sales figures to generate Incremental Procurement Targets (IPTs) and Annual Procurement Targets (APTs).
14. In deficit years, the spreadsheet calculates what portion of the deficit is eligible for IPT deferral and earmarking. The user records how they elect to treat the deficit(s) in the relevant sections, including using surplus procurement. The spreadsheet calculates the allowable IPT deferral and Earmarking amount through 2020.

EARMARKING DETAIL TAB

15. Enter information for contracts that are eligible for earmarking and are being used for flexible compliance purposes. Data populates the earmarking section in the "Accounting" tab. LSEs should including power purchase agreements used for earmarking with their compliance filings, so Energy Division may verify eligibility. If the LSE has provided the power purchase agreement in a prior report or filing, it does not need to be provided again.

PROCUREMENT DETAIL TAB

16. Procurement Summary: *Total RPS Eligible Procurement* is differentiated by three categories, *existing and or signed contracts*, *short-listed/under negotiation/pending approval*, and *generic future contracts*. This section is populated by completing the Contract Detail section below. If the LSE has entered into contracts that are short-term or with existing facilities but cannot meet its Annual Minimum Contracting Requirement, then deliveries from those contracts may not be used for compliance in any year (D.07-05-028).

> *Annual Contracting Quota Requirement*: LSEs must enter into long-term contracts or contracts with new facilities for energy deliveries equivalent to at least 0.25% of that LSE's prior years' retail sales, if it intends to use deliveries from short-term contracts and/or existing facilities, for RPS compliance purposes. LSEs must submit supporting documentation proving that the requirement has been met (i.e. a power purchase agreement for a long-term and/or new contract). If the LSE has provided the power purchase agreement in a prior report or filing, it does not need to be provided again.

- Contracts are differentiated by Contract term-length and type (row 15:16). All deliveries from "long-term and/or new" are automatically entered into "Cumulative Surplus Contracting Quota Bank" (row 19) and the user must input the MWh in row 18 that the LSE needs to comply with the Annual Contracting Quota Requirement, if necessary.

17. RPS Eligible Procurement by Resource Type: This report must state the amount procured or projected to be procured from each resource type (D.05-07-039, Appendix A, D.06-10-050, page 47-48). This information is reported in rows 25-38 in the "Procurement Detail" tab and populated by completing the "Contract Detail" section.

18. Contract Detail: For each contract, enter actual and forecasted delivery data throughout the contract term. Do not assume that an expiring contract will be renegotiated.

> *Pre-2002 Contracts*: Input total annual deliveries by resource type

> *2002-Present years' Contracts*: List contracts by name, annual deliveries (MWh), project status, facility status and resource type.

> *2005-Present years' Contracts*: In addition to the requirements above, contracts from these years should be identified by term-length, short-term (less than 10 years) and long-term, as well as, by type, existing or new (defined below). 2005 and 2006 contracts that were signed prior to 2007 can be identified as "n/a" for this purpose.

- *"Contract Length / Type"* (Column "X") Pursuant to D.07-05-028, starting in 2007, each RPS-obligated LSE must, in order to be able to count for any RPS compliance purpose energy deliveries from contracts of less than 10 years' duration ("short-term") with RPS-eligible facilities that commenced commercial operation prior to January 1, 2005 ("existing facilities"), in each calendar year enter into contracts with facilities of at least 10 years' duration ("long-term") and/or short-term contracts with facilities that commenced commercial operation on or after January 1, 2005 ("new facilities") for energy deliveries equivalent to at least 0.25% of that LSE's prior year's retail sales ("minimum quantity").

- *"Contract Volume"* (Column "Y") Input the total MWh over the term of the contract identified in the power purchase agreement. Compliance with the minimum quota requirement is measured by contracted-for-energy, not deliveries.

> *"Generic Future Contracts"*: Input total forecasted annual deliveries by resource type

> *"Expired Contracts"*: Any contract expiring prior to 2020 should be listed in this section. User should identify expired contract by name and input annual deliveries (MWh) in the first year the contract is no longer delivering for the LSE (per existing contract) and in every year thereafter. For example, if a contract with annual deliveries of 10,000 MWh expired 12/31/2007, user should enter 10,000 MWh in 2008 and in every year thereafter. If this same contract expired 6/30/2007, user should enter 5,000 MWh in 2007 and 10,000 in every year thereafter. If an expired or expiring contract is re-signed, remove contract information from "Expired Contracts" section and enter it under the appropriate contracting year, as you would for any other contract.

19. In the "Contract Status" column, "short-listed and/or under negotiation" is an option; use the short-listed option only for projects for which the LSE has a high level of confidence that a contract will be executed.
20. If any procurement data for a specific contract differs from what is entered into the CEC-RPS-Track form for that year, the specific cell should be highlighted and the discrepancy should be explained.

Spreadsheet user notes

> Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell - click on "fill color" icon - choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.

> Adding and/or deleting rows. The "Earmarking Detail" tab and "Procurement Detail" tab allows users to add to or delete rows. Within the desired section, highlight entire row(s) by selecting the excel row number(s) - right click and select "copy" - right click again and select "insert copied cells"

RPS Compliance Report: Summary

Bear Valley Electric Service	2007
August 3, 2009	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	141,235	
Annual Procurement Target (APT)	6,708	4.7%
Total RPS Eligible Procurement	0	0.0%
Annual Procurement Surplus/(Deficit)	(6,708)	
Adjusted Procurement Percentage*		3.9%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	0	0.0%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	0	0.0%

Flexible Compliance	MWh
IPT Deferral	5,439
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	5,439

Deficits and Penalties	2007
Preliminary Procurement (Deficit)	(6,708)
Adjusted Annual Procurement Deficit	(6,708)
Adjusted Deficit Deferred	5,439
Potential Penalty	\$335,411
Current Penalty (with flexible compliance)	\$63,461

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

☒ Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-10-050 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

RPS Compliance Report: Summary

Bear Valley Electric Service	2008
August 3, 2009	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	140,441	
Annual Procurement Target (APT)	8,113	5.8%
Total RPS Eligible Procurement	0	0.0%
Annual Procurement Surplus/(Deficit)	(8,113)	
Adjusted Procurement Percentage*		0.2%

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

RPS Eligible Procurement	MWh	%
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	0	0.0%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	0	0.0%

Flexible Compliance	MWh
IPT Deferral	351
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	351

Deficits and Penalties	2008
Preliminary Procurement (Deficit)	(8,113)
Adjusted Annual Procurement Deficit	(8,113)
Adjusted Deficit Deferred	351
Potential Penalty	\$405,631
Current Penalty (with flexible compliance)	\$388,081

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

☒

Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-10-050 and Public Utilities Code Section 399.14(a))

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferr

- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

RPS Compliance Report: Accounting

Bear Valley Electric Service
August 3, 2009

Line#	RPS Baseline Calculation	(MMV)
1	2007 Customer Retail Sales	125,910
2	2007 RPS Procurement	132,850
3	2003 Total Retail Sales	1,203
4	2003 Baseline Procurement Amount	

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
	Actual	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast

	Input Required	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast
	Actual Data														

Line#	RPS Procurement and Targets (MMV)	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
5	Total RPS Procurement	12,269	13,549	12,065	14,055	14,041	13,708	13,077	12,150	11,397	10,717	10,130	9,563	9,024	8,516	8,028	7,556	7,093	6,630
6	Annual Procurement Target (APT)	0	0	0	0	0	0	0	22,532	23,289	23,948	24,311	24,563	24,699	24,725	24,733	24,734	24,734	24,734
7	Annual Procurement Target (APT) - 1 to Be Filled in Current Year	1,269	N/A	N/A	N/A	6,708	8,113	9,486	26,093	26,224	26,617	27,063	27,422	27,685	27,912	28,112	28,283	28,419	28,544
8	Annual Procurement Target (APT) - 2 to Be Filled in Current Year	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9	Preliminary Procurement Surplus (Deficit)	N/A	N/A	N/A	N/A	(6,708)	(8,113)	(9,486)	(26,093)	(26,224)	(26,617)	(27,063)	(27,422)	(27,685)	(27,912)	(28,112)	(28,283)	(28,419)	(28,544)
10	APT Percentage	0.0%	0.0%	0.0%	0.0%	4.7%	5.8%	6.9%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
11	Actual Procurement Percentage	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	17.3%	17.6%	22.9%	21.6%	20.9%	20.2%	19.6%	19.0%	18.3%	17.8%	17.2%
12	Adjusted Procurement Percentage*	N/A	N/A	N/A	N/A	3.3%	9.2%	9.2%	17.3%	17.6%	22.9%	21.6%	20.9%	20.2%	19.6%	19.0%	18.3%	17.8%	17.2%

Line#	Flexible Compliance - IPT Deferral	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
13	Deliveries being Carried Forward to Year + 1	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
14	Deliveries being Carried Forward to Year + 2	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15	Deliveries being Carried Forward to Year + 3	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
16	Remaining Deficit from Year - 1 to Be Filled in Current Year	N/A	N/A	N/A	N/A	5,430	351	313	326	0	0	0	0	0	0	0	0	0	0
17	Remaining Deficit from Year - 2 to Be Filled in Current Year	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0
18	Remaining Deficit from Year - 3 to Be Filled in Current Year	N/A	N/A	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0
19	Current Year Surplus Procurement Applied to Year - 1 Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
20	Current Year Surplus Procurement Applied to Year - 2 Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
21	Current Year Surplus Procurement Applied to Year - 3 Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22	Current Year Surplus Procurement Applied to Year - 1 Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Current Year Surplus Procurement Applied to Year - 2 Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
24	Current Year Surplus Procurement Applied to Year - 3 Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
25	Total Deliveries Applied to Prior Year IPT Deficits	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Line#	Flexible Compliance - Earmarking	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
26	Portion of Current Year Deficit Earmarked for Earmarking	N/A	N/A	N/A	N/A	6,355	7,752	9,133	2,235	2,603	0	0	0	0	2,235	2,603	2,603	2,603	2,603
27	Future Deliveries Earmarked from Year + 1	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
28	Future Deliveries Earmarked from Year + 2	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
29	Future Deliveries Earmarked from Year + 3	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30	Total Earmarked Procurement Earmarked to Current Year	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31	Current Year Deliveries Earmarked to Year - 1	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
32	Current Year Deliveries Earmarked to Year - 2	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
33	Current Year Deliveries Earmarked to Year - 3	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
34	Total Deliveries Earmarked to Prior Year Earmarked Deficits	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Line#	Surplus Procurement Bank	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
35	Surplus Procurement Bank Balance as of Prior Year	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
36	Adjusted Current Year Annual Surplus Procurement	0	0	0	0	0	0	0	0	0	3,331	3,331	5,558	6,631	7,165	7,165	7,165	7,165	7,165
37	Adjusted Current Year Annual Surplus Procurement	0	0	0	0	0	0	0	0	0	3,331	3,331	5,558	6,631	7,165	7,165	7,165	7,165	7,165
38	Cumulative Surplus Procurement Bank Balance	0	0	0	0	0	0	0	0	0	3,331	5,558	6,631	7,165	7,165	7,165	7,165	7,165	7,165

Line#	Adjusted Deficit	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
39	Adjusted Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
40	Adjusted Deficit	N/A	N/A	N/A	N/A	0	0	0	0	0	0	0	0	0	0	0	0	0	0
41	Potential Penalty	N/A	N/A	N/A	N/A	5,430	351	313	326	0	0	0	0	0	0	0	0	0	0
42	Current Penalty (with flexible compliance)	N/A	N/A	N/A	N/A	\$55,411	\$455,631	\$43	\$38	(2,635)	0	0	0	0	(67)	(1,644)	(2,365)	(3,265)	(4,131)

RPS Compliance Report: Earmarking Detail

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Bear Valley Electric Service
August 3, 2009

[illegible]

RPS Compliance Report: Procurement Detail

Input Required
Forecasted Data
Electric Service
August 3, 2029

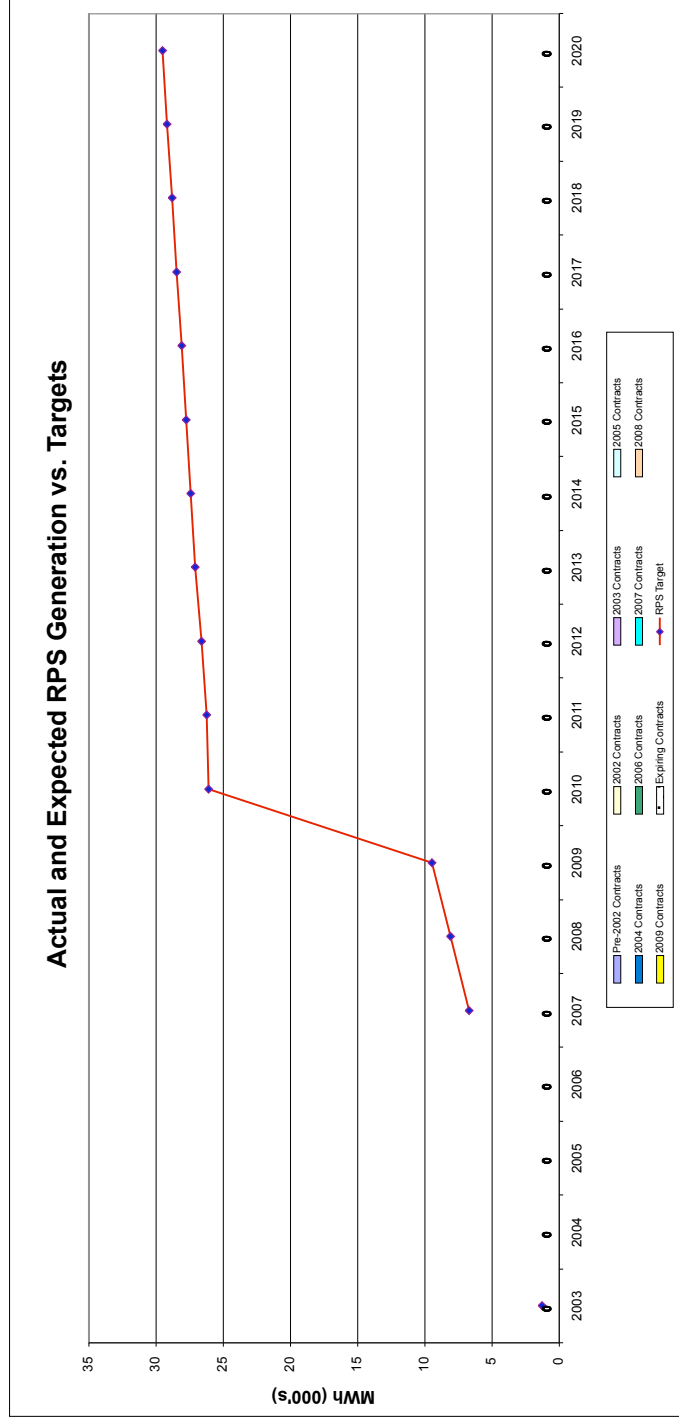
Dear Valley Electric Service
August 3, 2009

[illegible]

RPS Compliance Report: Performance Chart

Bear Valley Electric Service
August 3, 2009

RP's Procurement and Targets (MWh)																			
	2003	2004	2005	Actual MWh			2007	2008	Forecast MWh				Forecast MWh						
Total Retail Sales	132,850	135,759	134,066	141,235	140,441	137,358			130,467	131,120	133,087	135,417	137,110	138,824	140,589	142,316	144,005	145,686	147,368
Actual RP's Procurement %	N/A	0.0%	0.0%	0.0%	0.0%	0.0%			0.0%	0.7%	1.3%	2.1%	2.8%	3.5%	4.2%	4.9%	5.6%	6.3%	7.0%
Actual RP's Procurement	N/A	1,328	1,350	1,341	1,404	1,374			1,305	909	1,610	2,850	3,810	4,890	5,970	7,050	8,130	9,210	10,290
APT % (Baseline for 2003)	N/A	N/A	N/A	N/A	4.7%	5.6%			6.5%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%	20.0%
APT as MWh Amount	N/A	N/A	N/A	N/A	6,708	8,113			9,486	26,033	26,224	26,617	27,083	27,422	27,765	28,112	28,463	28,819	29,179
Preliminary Surplus/(Deficit)	N/A	N/A	N/A	N/A	(6,708)	(8,113)			(9,486)	(12,935)	(13,551)	(13,331)	(12,713)	(12,173)	(11,587)	(11,044)	(10,491)	(9,948)	(9,405)



RPS Compliance Report: Calculations

RPS Baseline Inputs (MWh)			
Line#	Calculation	Notes	
1	User supplied data	Pursuant to D.07-03-046, the 2003 Initial Baseline Procurement Amount for the investor owned utilities (IOUs) is calculated using the following equation:	
2	User supplied data		
3	User supplied data		
4	Baseline formula =		
		<u>2001 RPS Eligible Procurement</u>	<u>2001 Total Retail Sales</u>
		X	2003 Total Retail Sales
		+	1% of 2001 Total Retail Sales

RPS Procurement and Targets (MWh)		
Line#	Calculation	Notes
5	User supplied data	Annual Retail Sales
6	Data from "Procurement Detail" tab	In current and past years, this line should equal Total RPS Eligible Procurement in procurement detail tab.
7	Prior year Line 7 + Line 8	
8	1% of line 5 (Y-1)	
9	Line 6 - Line 7	
10	Line 7 / Line 5 (Y-1)	
11	Line 6 / Line 5 (Y-1)	In 2003, 2003 RPS procurement is divided by 2001 retail sales rather than 2002 retail sales.
12	(Line 6 + Line 17 + Line 25 + Line 30 + Line 34 + Line 36) / Line 5 (Y-1)	RPS procurement percentage after applying flexible compliance, assuming all allowable planned deliveries come online as planned.

Flexible Compliance - IPT Deferral		
Line#	Calculation	Notes
13	Up to 0.25% of Prior Year Retail Sales	In 2007, 100% of the IPT can be deferred for up to 3 years without explanation.
14-16	User supplied data	
17	Sum of Lines 14-16	Current year deficit carried forward. Warning if cell value is greater than Line 13.
18-20	Record of Lines 14-16	Deferred IPT obligations due in current year.
21	Sum of Lines 18-20	Total deferred IPT obligations due in current year.
22-24	User supplied data	Past year IPT obligations retired with current year surplus procurement. Per accounting rules D. 06-10-050, Attachment A, page 9-10, current year deliveries may only be applied to past year IPT deficits after earmarked deliveries have been subtracted, and after any deliveries needed to meet current year APT have also been subtracted (D.03-06-071), Conclusion of Law 25).
25	Sum of Lines 22-24	Total current year surplus applied to prior year IPT obligations due in current year.

Flexible Compliance - Earmarking		
Line#	Calculation	Notes
26	Line 9 + Line 13 + Line 34	Portion of current year deficit greater than allowable IPT Deferral.
27-29	Data from "Earmarking Detail" tab	User supplied data from "planned" column in respective year.
30	Sum of Lines 27-29	
31-33	Data from "Earmarking Detail" tab	User supplied data. Current year deliveries may only be applied to past year deficits which have been deferred by earmarking, after current year APT has been met (D.03-06-071), Conclusion of Law 25).
34	Sum of Lines 31-33	Total current year surplus subtracted to meet prior years Earmarking obligations due in current year.

Surplus Procurement Bank		
Line#	Calculation	Notes
35	Line 38 (Y-1)	
36	User supplied data	
37	Line 9+ Line 25 + Line 34	Current year surplus procurement less any prior year IPT obligations and/or Earmarking obligations
38	Sum of Lines 35-37	

Adjusted Deficit		
Line#	Calculation	Notes
39	Line 9 + balance of IPT obligations after 3 years + balance of Earmarking obligations after 3 years	In any current year, the adjusted annual procurement deficit is the LSE's annual deficit less any deliveries used to meet IPT or Earmarking obligations for prior years deficits. Any portion of adjusted annual procurement deficit that remains after the following three years is subject to penalty.
40	Balance of IPT obligations after 3 years + balance of Earmarking obligations after 3 years	In any current year, the adjusted deficit temporarily excused is the sum of IPT deferral and Earmarked deliveries (line 17+ line 30). Any portion of line 40 remaining after 3 years will be reflected in line 39 and subject to penalty.
41	Line 39 * \$50.0	Per accounting rules, LSEs must list penalty based the size of on adjusted annual procurement deficit, even if allowable reasons are being given for why the penalty is not yet due and payable. Penalties are assessed at \$0.05/kWh deficit.
42	(Line 39 + 40) * \$50.0	LSE's have the opportunity to make up annual procurement deficits through existing flexible compliance rules. Accordingly, if an LSE has a deficit in year 1, and is able to fully exercise flexible compliance mechanisms, the penalty for year 1 compliance may not apply.

OFFICER VERIFICATION FORM

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by the Energy Division, except for the addition of three supplemental worksheets added after this verification.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 3, 2009 at San Dimas, California.

/s/ Keith Switzer

Keith Switzer

Vice President of Regulatory Affairs

RPS Compliance Report: Summary

MODIFIED

Bear Valley Electric Service	2007
August 3, 2009	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	141,235	
Annual Procurement Target (APT)	6,708	4.7%
Total RPS Eligible Procurement	0	0.0%
Annual Procurement Surplus/(Deficit)	(6,708)	
Adjusted Procurement Percentage*		4.7%

RPS Eligible Procurement	MWh	%
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	0	0.0%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	0	0.0%

Flexible Compliance	MWh
IPT Deferral	6,708
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	6,708

Deficits and Penalties	2007
Preliminary Procurement (Deficit)	(6,708)
Adjusted Annual Procurement Deficit	(6,708)
Adjusted Deficit Deferred	6,708
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

☒ Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (D.03-12-065, D.03-06-071, D.06-10-050 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)
 - [Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]
- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

MODIFIED

RPS Compliance Report: Summary

Bear Valley Electric Service	2008
August 3, 2009	

RPS Summary Report	MWh	%
Prior Year Total Retail Sales	140,441	
Annual Procurement Target (APT)	8,113	5.8%
Total RPS Eligible Procurement	0	0.0%
Annual Procurement Surplus/(Deficit)	(8,113)	
Adjusted Procurement Percentage*		5.8%

RPS Eligible Procurement	MWh	%
Biomass	0	0.0%
Digester Gas	0	0.0%
Biodiesel	0	0.0%
Landfill Gas	0	0.0%
Muni Solid Waste	0	0.0%
<i>Biopower Subtotal</i>	0	0.0%
Geothermal	0	0.0%
Small Hydro	0	0.0%
Conduit Hydro	0	0.0%
Solar PV	0	0.0%
Solar Thermal	0	0.0%
Wind	0	0.0%
Ocean/Tidal	0	0.0%
Fuel Cells	0	0.0%
Total RPS Eligible Procurement	0	0.0%

Flexible Compliance	MWh
IPT Deferral	8,113
Earmarking	0
Banked Procurement Applied	0
Total Flexible Compliance	8,113

Deficits and Penalties	2008
Preliminary Procurement (Deficit)	(8,113)
Adjusted Annual Procurement Deficit	(8,113)
Adjusted Deficit Deferred	8,113
Potential Penalty	\$0
Current Penalty (with flexible compliance)	\$0

☒ Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as n

- Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable (D.03-12-065, D.03-06-071, D.06-10-050 and Public Utilities Code Section 399.14(a)
[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year
to cover above-market costs, Seller non-performance, Lack of effective compet
- If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match Procurement Detail tabs.

RPS Compliance Report: Accounting

MODIFIED

Line#	RPS Baseline Calculation	(MWh)
<u>1</u>	2001 Total California Retail Sales	126,911
<u>2</u>	2001 RPS Eligible Procurement	0
<u>3</u>	2003 Total Retail Sales	132,850
<u>4</u>	2003 Baseline Procurement Amount	1,269

RPS Procurement and Targets (MWh)			
	2003	2004	
<u>5</u>	Bundled Retail Sales	132,850	135,759
<u>6</u>	Total RPS Eligible Procurement	0	0
<u>7</u>	Annual Procurement Target (APT)	1,269	N/A
<u>8</u>	Incremental Procurement Target (IPT)	N/A	1,329
<u>9</u>	Preliminary Procurement Surplus/(Deficit)	N/A	N/A
<u>10</u>	APT Percentage	N/A	N/A
<u>11</u>	Actual Procurement Percentage	0.0%	0.0%
<u>12</u>	Adjusted Procurement Percentage*	N/A	N/A

Flexible Compliance - IPT Deferral			
	2003	2004	
<u>13</u>	Maximum Deficit Eligible for Deferral	N/A	N/A
<u>14</u>	Deficit being Carried Forward to Year + 1	N/A	N/A
<u>15</u>	Deficit being Carried Forward to Year + 2	N/A	N/A
<u>16</u>	Deficit being Carried Forward to Year + 3	N/A	N/A
<u>17</u>	Total Current Year Deficit (≤ 25% IPT) Carried Forward	N/A	N/A
<u>18</u>	Remaining Deficit from Year - 1 to Be Filled in Current Year	N/A	N/A
<u>19</u>	Remaining Deficit from Year - 2 to Be Filled in Current Year	N/A	N/A
<u>20</u>	Remaining Deficit from Year - 3 to Be Filled in Current Year	N/A	N/A
<u>21</u>	Total Prior Year IPT Deficits That Must Be Filled This Year	N/A	N/A
<u>22</u>	Current Year Surplus Procurement Applied to Year - 1 Deficit	N/A	N/A
<u>23</u>	Current Year Surplus Procurement Applied to Year - 2 Deficit	N/A	N/A
<u>24</u>	Current Year Surplus Procurement Applied to Year - 3 Deficit	N/A	N/A
<u>25</u>	Total Deliveries Applied to Prior Year IPT Deficits	N/A	N/A

Flexible Compliance - Earmarking		2003	2004
26	Portion of Current Year Deficit Eligible for Earmarking	N/A	N/A
27	Future Deliveries Earmarked from Year + 1	N/A	N/A
28	Future Deliveries Earmarked from Year + 2	N/A	N/A
29	Future Deliveries Earmarked from Year + 3	N/A	N/A
30	Total Projected Procurement Earmarked to Current Year	N/A	N/A
31	Current Year Deliveries Earmarked to Year - 1	N/A	N/A
32	Current Year Deliveries Earmarked to Year - 2	N/A	N/A
33	Current Year Deliveries Earmarked to Year - 3	N/A	N/A
34	Total Deliveries Earmarked to Prior Year Earmarked Deficits	N/A	N/A

Surplus Procurement Bank		2003	2004
35	Surplus Procurement Bank Balance as of Prior Year	0	0
36	Application of Banked Surplus Procurement to Current Year Deficit		
37	Adjusted Current Year Annual Surplus Procurement	0	0
38	Cumulative Surplus Procurement Bank Balance	0	0

Adjusted Deficit		2003	2004
39	Adjusted Annual Procurement Deficit	N/A	N/A
40	Adjusted Deficit Deferred	N/A	N/A
41	Potential Penalty	N/A	N/A
42	Current Penalty (with flexible compliance)	N/A	N/A

Potential Penalty may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance

Bear Valley Electric Service
August 3, 2009

Input Required
Forecasted Data
Actual Data

Actual			Forecast				
2005	2006	2007	2008	2009	2010	2011	2012
134,066	141,235	140,441	137,358	130,467	131,120	133,087	135,417
0	0	0	0	0	22,532	23,289	29,948
N/A	N/A	6,708	8,113	9,486	26,093	26,224	26,617
1,358	1,341	1,412	1,404	1,374	16,607	131	393
N/A	N/A	(6,708)	(8,113)	(9,486)	(3,561)	(2,935)	3,331
N/A	N/A	4.7%	5.8%	6.9%	20.0%	20.0%	20.0%
0.0%	0.0%	0.0%	0.0%	0.0%	17.3%	17.8%	22.5%
N/A	N/A	4.7%	5.8%	6.9%	17.5%	17.8%	22.5%

Actual			Forecast				
2005	2006	2007	2008	2009	2010	2011	2012
N/A	N/A	5,439	351	343	326	328	0
N/A	N/A	0	0	0	0	0	0
N/A	N/A	0	0	0	0	0	0
N/A	N/A	6,708	8,113	9,486	326	0	0
N/A	N/A	6,708	8,113	9,486	326	0	0
N/A	N/A	N/A	0	0	0	0	0
N/A	N/A	N/A	N/A	0	0	0	0
N/A	N/A	N/A	N/A	N/A	(6,708)	(8,113)	(9,486)
N/A	0	0	0	0	(6,708)	(8,113)	(9,486)
N/A	N/A	N/A	0	0	0	0	0
N/A	N/A	N/A	N/A	0	0	0	0
N/A	N/A	N/A	N/A	N/A	0	0	0
N/A	N/A	N/A	0	0	0	0	0

Actual				Forecast			
2005	2006	2007	2008	2009	2010	2011	2012
N/A	N/A	6,355	7,762	9,143	3,235	2,608	0
N/A	N/A	0	0	0	0	0	0
N/A	N/A	0	0	0	0	0	0
N/A	N/A	0	0	0	0	0	0
N/A	N/A	0	0	0	0	0	0
N/A	N/A	N/A	0	0	0	0	0
N/A	N/A	N/A	0	0	0	0	0
N/A	N/A	N/A	N/A	0	0	0	0
N/A	N/A	N/A	N/A	N/A	0	0	0
N/A	N/A	N/A	0	0	0	0	0

Actual				Forecast			
2005	2006	2007	2008	2009	2010	2011	2012
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	0
0	0	0	0	0	0	0	3,331
0	0	0	0	0	0	0	3,331

Actual				Forecast			
2005	2006	2007	2008	2009	2010	2011	2012
N/A	N/A	(6,708)	(8,113)	(9,486)	(3,561)	(2,935)	0
N/A	N/A	6,708	8,113	9,486	326	0	0
N/A	N/A	\$0	\$0				
N/A	N/A	\$0	\$0				

CERTIFICATE OF SERVICE

I, Denise E. Lynch certify:

I am employed in the City of Roseville, County of Placer, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 2999 Douglas Boulevard, Suite 325, Roseville, California 95661.

On August 3, 2009, I caused the following to be served:

**RENEWABLE PORTFOLIO STANDARD COMPLIANCE REPORT
SUBMITTED BY
BEAR VALLEY ELECTRIC SERVICE,
A DIVISION OF GOLDEN STATE WATER COMPANY (U 913-E)**

INCLUDING THE

**AUGUST 2009 SEMI-ANNUAL COMPLIANCE REPORT
PURSUANT TO THE CALIFORNIA RENEWABLES
PORTFOLIO STANDARD**

via electronic mail to all parties on the service list R.08-08-009 who have provided the Commission with an electronic mail address and by First Class mail on the parties listed on the service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at Roseville, California.

/s/ Denise E. Lynch
Denise E. Lynch

VIA FIRST CLASS MAIL

3 Phases Renewables, LLC
2100 Sepulveda Blvd., Suite 37
Manhattan Beach, CA 90266

Michael Meacham
Environmental Resource Manager
City of Chula Vista
276 Fourth Avenue
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